

Butler, Jennie C

From: bcb56 [bcb56@ix.netcom.com]
Sent: Friday, June 11, 1999 10:11 PM
To: fdadockets@oc.fda.gov
Subject: Petition # 99P-1340/CP 1

June 11, 1999

Dockets Management Branch
The Food and Drug Administration
Department of Health and Human Services, Rm. 1-23
12420 Parklawn Dr.
Rockville, MD 20857

Re: 99P-1340/CP 1

Dear Sir or Madam:

There are very few laws in place concerning the safety of fragranced products. Most people use fragranced products on a daily basis with no thought as to whether they are safe or not. This is because people mistakenly assume such products must be fully safety tested before they are marketed. It is further assumed that if they were not safe they would be quickly removed from the market by regulatory agencies such as the FDA.

How unfortunate that this is not the case. The reality is that products do not have to be tested before marketing and the FDA rarely tests them after marketing. The few laws that are in place are rarely enforced. The majority of the substances used in fragranced products have not been fully safety tested; yet the required warning label is not on the products.

Fragranced products can negatively impact both the user and those in contact with "second hand" fragrance. Those with allergies, asthma, sinus problems, chronic lung disease, migraines, and other health problems are negatively impacted by fragrance. In addition fragrance chemicals can be absorbed through the skin and stored in fat tissue. It is present in mother's milk. Synthetic musk compounds are found in waterways and aquatic wildlife. Avoidance of exposure to these products is virtually impossible.

In spite of the impact on health and the environment, the fragrance industry continues to deny there is a problem. As a self regulated industry, it is felt there is little to fear. Products designed to be inhaled are not tested for effects on the lungs. Even though fragrance materials used in the past were severely neurotoxic, there is no routine testing for neurological effects. Increased concerns over the potential of phthalates as hormone disrupters have not prevented the industry from using phthalates. In Eternity eau de parfum, diethyl phthalate is present at over 10%. Diethyl phthalate has a low level of volatility and remains on the skin where it can be absorbed.

There is a lifetime of exposure to fragranced products. The accumulation in body tissues and long term effects has to be considered. Fragrance companies are targeting children as young as three. Children are especially vulnerable to the effects of chemicals. Their skin is thinner so there is more potential for absorption. They are smaller so the dosages are higher. Their systems are immature and are more susceptible to damage. Their lungs and nervous system are damaged more easily. A child that develops allergy or sensitization to a fragrance chemical usually has to deal with that sensitization for life.

I have compiled information on fragrances, chemicals used in them, and their effects on health for the past four years. I have

C 104

99P-1340

mūch of this information up on a website. Because of this people tend to think I may have some answers as to what to do when coworkers' perfumes make them ill and they are having a terrible time being able to work. I receive several letters a week from people that are made ill by others use of fragranced products.

The fragrance industry is doing a very poor job of regulating itself. It is essential the FDA start monitoring the contents and safety of these products. I urge the FDA to grant petition # 99P-1340/CP 1 and declare Éternity eau de parfum misbranded. This will send a strong message to the fragrance industry that existing laws will be enforced and the industry must be accountable for the products that are marketed.

Betty Bridges, RN
Fragranced Products Information Network (FPIN)
For information on health effects of fragrances, visit:
<http://www.ameliaww.com/fpin/fpin.htm>